



DEPARTMENT OF THE NAVY

ENGINEERING FIELD ACTIVITY, NORTHEAST
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

N62661.AR 001902
NAVSTA NEWPORT RI
5090 3a

IN REPLY REFER TO

5090
Code EV23/CF
March 28, 2005

Ms. Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section
USEPA Region 1
1 Congress Street, Suite 1100
Boston, MA 02114-2023

Mr. Paul Kulpa, Project Manager
Office of Waste Management
Rhode Island Department Of Environmental Management
235 Promenade St.
Providence, RI 02908-5767

Dear Ms. Keckler/ Mr. Kulpa:

SUBJECT: TECHNICAL MEMORANDUM FOR SUPPLEMENTAL SOIL
INVESTIGATION, ADDITIONAL BORINGS OLD FIRE FIGHTER
TRAINING AREA, SITE 009, NAVAL STATION NEWPORT, NEWPORT,
RHODE ISLAND

The Navy's responses to EPA and RIDEM comments on the subject document are provided as enclosures (1) and (2), respectively. The investigation is scheduled for the week of April 4-8. Results from this investigation will be reported as an addendum to the Final Pre-Design Investigation Report.

If you have any questions, please do not hesitate to contact me at (610) 595-0567 extension 142.

Sincerely,

CURTIS A. FRYE, P.E.
Remedial Project Manager
By direction of the
Commanding Officer

5090
Code EV23/CF
March 28, 2005

Enclosures:

1. Navy Responses to Comments from USEPA on the Technical Memorandum for Supplemental Soil Investigation - Additional Borings at the Old Fire Fighting Training Area, Site 009 (Comments Dated March 23, 2005)

2. Navy Responses to Comments from RIDEM on the Technical Memorandum for Supplemental Soil Investigation - Additional Borings at the Old Fire Fighting Training Area, Site 009 (Comments Dated March 24, 2005)

copy to:

C. Mueller, NSN
S. Parker TtNUS
J. Stump, Gannett-Fleming

R s p n s s t o C m m n t s F r o m t h
U.S. E n v i r n m n t a l P r o t e c t i o n A g e n c y
T e c h n i c a l M e m o r a n d u m f o r S u p p l e m e n t a l S o i l I n v e s t i g a t i o n -
A d d i t i o n a l B o r i n g s a t t h e O l d F i r e F i g h t i n g T r a i n i n g A r e a
C o m m e n t s D a t e d M a r c h 2 3 , 2 0 0 5

1. General Comments:

EPA notes that Figure 4, dated February 9, 2005, which depicted the B-1 excavation plan showing grids requiring below grade excavation, omitted grids that will require below grade excavation. In particular, there is a large area along the northeastern shore that will require below grade excavation for TPH, including grids A-8 through A-10 and portions of grids B-8 through B-10. Although the averaging calculations provided previously in the Navy spreadsheet concluded that no excavation below the water table was required in these grids for the B-1 alternative, that conclusion is not realistic.

EPA has also noted that Figure 4 does not include below grade excavation in grid B-5 although there is significant PAH contamination there down to approximately three feet below the water table. As we discussed in our teleconference on March 16, 2005, some locations at the site should be excavated to remove significant PAH contamination. This is one of them. Grid A-7 has significant PAH contamination below the water table that also requires excavation.

It is unclear why the Navy proposes to excavate grid B-2 which has no TPH contamination and only marginal PAH contamination and suggests that resources planned for this grid be used for grid B-5 instead.

Response: These comments are appreciated. We propose to discuss details of the scope of the soil removal action in conjunction with review and comment on the Draft Soil Removal Action Work Plan.

Specific Comments

- a. *Provide one additional boring 50 feet north of SB408 and another boring 50 feet south of SB408 to better define the extent of the PAH contamination detected at SB408, which will better define the initial excavation limits.*

Response: We will shift one proposed location near B-9 in the C4 grid cell to the C-5 grid cell to cover one station, then add another station on the B5/A5 line.

- b. *Add one boring immediately west of the 24-inch RCP drainage pipe in the eastern portion of grid A-7 approximately 40 feet south of SB428. This boring will define the western limits of the significant TPH and PAH contamination found in the prior explorations in grid A-8 (MW-102, TP-15, SB403, and SB429) and define the extent of the significant PAH contamination in SB428, which needs to be excavated to below the water table.*

Response: Navy concurs.

- c. *Move the proposed boring located between SB411 and SB412 to a point approximately 40 feet ENE of SB412. This boring will help define the southern extent of significant TPH contamination found at SB404, TP14, and TP16. The Navy's proposed boring location is in the immediate vicinity of boring B-15 which has apparently been omitted from the PDI report figures but is shown in the PDI work plan figure. B-15 had significant PAH contamination at approximately 2-3 feet below base grade and no analysis for TPH was performed for B-15.*

Response: Navy concurs.

- d. *The need for the proposed boring between SB424 and SB434 is not clear. This area apparently has very shallow bedrock based on the bedrock elevations found at B-17 and SB424 and there is no significant organic contamination at B-17 or SB424. EPA recommends that this boring be deleted and used for one of the other borings proposed above.*

Response: Navy concurs.

**Response Comments From
Rhode Island Department of Environmental Management
Technical Memorandum for Supplemental Soil Investigation –
Additional Borings at the Old Fire Fighting Training Area
Comments Dated March 24, 2005**

1. General Comments:

The memorandum was submitted for review approximately seven working days prior to the scheduled start date for fieldwork. The Office of Waste Management is concerned with the submission of a work plan for review immediately prior to the work being performed. This approach does not allow for an adequate review by the regulators and /or response to comments and modification of the document by the Navy. In addition, the late submission date does not appear to be justified as the work plan notes that the need for additional borings was ascertained after a review of the Predesign Report, produced in July 2004, comments on the Predesign Report, comments were submitted in September of 2004, and the mound removal, central mound removal where the majority of the samples are proposed was completed in November 2004.

In general it is not clear from the submission whether the proposed effort is designed to fine tune the proposed removal action, that is provide a more "detailed" picture of the nature and extent of contamination, and/or add or delete areas which require remediation. If the effort is designed to fine tune the removal action experience has shown that the "detailed" extent of contamination is uncovered during the removal action itself and a tighter preexcavation boring density has often been found to have limited utility. This would bring into question the need to perform an additional investigation. If the effort is designed to eliminate areas of concern, additional borings beyond that proposed will be needed to eliminate a particular area. The proposed sampling effort, however, may have some utility in identifying additional areas, which may require remediation.

In regards to the proposed locations for the individual borings the Navy has not included a table and/or a discussion providing the justification for the individual boring location. This information is typically provided with all work plans as it allows the regulators to evaluate the rationale for proposed sample location. As this information was not submitted the Office of Waste Management is not able to determine whether the additional borings are in the correct location and/or are even needed.

Please clarify the intent of the investigation. Also with respect to the individual borings, please provide the rationale for the borings locations with sufficient time for regulatory review and Navy response prior to that start of any field activities.

Response: It should be clarified that additional borings have been proposed and scheduled in response to comments from the U.S.EPA on the Draft Soil PDI report. EPA's comments requested additional delineation of specific areas as described in the Technical Memorandum. During the conference call 2/22/05, this effort was discussed, and it therefore should not be a surprise to RIDEM. However, since it was not a RIDEM request, provision of the Technical Memorandum to RIDEM should have been considered as for informational purposes, and your letter suggesting lengthy technical review and comment period originating from your office is unnecessary.

In accordance with the Navy's response to comments dated 12/23/05, and the conference call discussion 2/22/05, EPA has already provided positive input to the subject document, and requested minor adjustments to the proposed stations.

Therefore we will not be providing additional submittals in accordance with the questions on your March 23 letter, but move forward with the investigation as requested by EPA and as needed for the design of the soil removal action.